IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ROBERT GARCON,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS INC., EQUIFAX INFORMATION SERVICES LLC, TRANS UNION LLC, and JOVIA FINANCIAL CREDIT UNION f/k/a NASSAU EDUCATORS FEDERAL CREDIT UNION,

Defendants.

Request **DENIED**. The parties have not complied with Rule 4(B)(iv) of the Court's Individual Rules of Practice in Civil Cases when submitting the proposed protective order.

Dated: May 10, 2023

SO ORDERED.

New York, New York

Case No: 1:22-cv-1169-ER United

VENNIEER L. ROCHONUnited States District Judge

UNOPPOSED MOTION FOR ENTRY OF PROTECTIVE ORDER

Defendant Experian Information Solutions, Inc. ("Experian"), by and through the undersigned counsel, moves the Court for entry of the Stipulated Protective Order, attached as Exhibit A, as follows:

- 1. The parties are seeking confidential documents and testimony in discovery. The disclosure of such information outside the scope of this litigation could result in significant injury to one or more of the parties' business or privacy interests.
- 2. The parties have stipulated to the Stipulated Protective Order attached as Exhibit A, and good cause exists for its entry.

WHEREFORE, Experian respectfully requests the Court issue the Stipulated Protective Order attached as Exhibit A.

Dated: May 9, 2023 Respectfully submitted,

/s/ Melanie K. Chan

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Counsel for Defendant

Experian Information Solutions, Inc.

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CERTIFICATE OF SERVICE

I, Melanie K. Chan, certify that on May 9, 2023, I caused the foregoing UNOPPOSED

MOTION FOR ENTRY OF PROTECTIVE ORDER to be filed with the Clerk of the Court and

served upon all counsel of record via the Court's CM/ECF system.

Dated: May 9, 2023

/s/ Melanie K. Chan

Melanie K. Chan